



November 8, 2016

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Comments on Recommendations Approved by the World Radiocommunications Advisory Committee (WAC)*, IB Docket No. 16-185

Dear Secretary Dortch:

EchoStar Operating Company and Hughes Network Systems, LLC (collectively, EchoStar) respectfully submit these comments in response to the above-referenced proceeding. EchoStar, as the largest US commercial geostationary satellite operator and the largest global provider of broadband satellite services, strongly supports efforts by the United States to safeguard existing satellite allocations and make additional spectrum available for the Fixed Satellite Service (FSS). Accordingly, EchoStar expressly supports the recommendations contained in the documents WAC/021 and WAC/022.

Concerning document WAC/021, as EchoStar stated in its recent comments in response to the Petition of the Boeing Company,¹ EchoStar is fully supportive of making the 51.4-52.4 GHz band available for use by the FSS and that the ITU-R study this issue in anticipation of and considered at WRC 2019.²

Also, EchoStar fully supports document WAC/022, which supports consideration at WRC 2023 of additional FSS allocations in the 37.5-39.5 GHz band (Earth to space). As demand for broadband connectivity continues to increase in the United States and globally, it is critical that satellite systems have access to additional spectrum to meet this growing demand, especially in less densely populated areas where satellites are ideal to meet the needs of the underserved or unserved populace.

Accordingly, EchoStar strongly supports the WAC-approved recommendations contained in documents WAC/021 and WAC/022 in order to provide additional satellite system operators access to additional FSS spectrum to support growing US and global demand for broadband connectivity.

Respectfully submitted,

/s/ Jennifer A. Manner

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cc: Michael Mullinex

¹ Petition of the Boeing Company for Allocation and Authorization of Additional Spectrum for the Fixed-Satellite Service in the 50.4-51.4 GHz and 51.4-52.4 GHz Bands, RM-11773, Public Notice Report No. 3051 (September 16, 2016).

² Comments of EchoStar, RM-11773, at 2-3 (October 17, 2016).